

In the Matter of the Accusation Against:)
)
)
ROGER HENRY STEUBLE, M.D.) Case No. 02-2012-226564
)
Physician's and Surgeon's)
Certificate No. G 49972)
)
Respondent.)
)

The attached Stipulated Surrender of License and Order is hereby adopted as the Decision and Order of the Medical Board of California, Department of Consumer Affairs, State of California.

IT IS SO ORDERED August 9, 2013.

By: Kimberly Kirchmeyer
Kimberly Kirchmeyer
Interim Executive Director

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES III
Supervising Deputy Attorney General
3 VLADIMIR SHALKEVICH
Deputy Attorney General
4 State Bar No. 173955
California Department of Justice
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7 *Attorneys for Complainant*

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
10 **STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 02-2012-226564

12 **ROGER HENRY STEUBLE, M.D.**
201 Clinton Rd., Ste. 204
13 **Jackson, CA 95642**
Physician's and Surgeon's Certificate
14 **No. G 49972**

**STIPULATED SURRENDER OF
LICENSE AND ORDER**

15 Respondent.

16
17 IT IS HEREBY STIPULATED AND AGREED by and between the parties in this
18 proceeding that the following matters are true:

19 PARTIES

20 1. Kimberly Kirchmeyer, (Complainant) is the Interim Executive Director of the
21 Medical Board of California. She brought this action solely in her official capacity and is
22 represented in this matter by Kamala D. Harris, Attorney General of the State of California, by
23 Vladimir Shalkevich, Deputy Attorney General.

24 2. Roger Henry Steuble, M.D. (Respondent) is representing himself in this proceeding
25 and has chosen not to exercise his right to be represented by counsel.

26 3. On or about May 23, 1983, the Medical Board of California issued Physician's and
27 Surgeon's Certificate No. G 49972 to Respondent. The Physician's and Surgeon's Certificate
28 expired on February 28, 2013, and has not been renewed.

1 JURISDICTION

2 4. Accusation No. 02-2012-226564 was filed before the Medical Board of California
3 (Board), Department of Consumer Affairs, and is currently pending against Respondent. The
4 Accusation and all other statutorily required documents were properly served on Respondent on
5 or about June 27, 2013. Respondent did not file a Notice of Defense. A copy of Accusation No.
6 02-2012-226564 is attached as Exhibit A and incorporated by reference.

7 ADVISEMENT AND WAIVERS

8 5. Respondent has carefully read, and understands the charges and allegations in
9 Accusation No. 02-2012-226564. Respondent also has carefully read, and understands the effects
10 of this Stipulated Surrender of License and Order.

11 6. Respondent is fully aware of his legal rights in this matter, including the right to a
12 hearing on the charges and allegations in the Accusation; the right to be represented by counsel, at
13 his own expense; the right to confront and cross-examine the witnesses against him; the right to
14 present evidence and to testify on his own behalf; the right to the issuance of subpoenas to compel
15 the attendance of witnesses and the production of documents; the right to reconsideration and
16 court review of an adverse decision; and all other rights accorded by the California
17 Administrative Procedure Act and other applicable laws.

18 7. Respondent voluntarily, knowingly, and intelligently waives and gives up each and
19 every right set forth above.

20 CULPABILITY

21 8. Respondent admits the truth of each and every charge and allegation in Accusation
22 No. 02-2012-226564, agrees that cause exists for discipline and hereby surrenders his Physician's
23 and Surgeon's Certificate No. G 49972 for the Board's formal acceptance.

24 9. Respondent understands that by signing this stipulation he enables the Board to issue
25 an order accepting the surrender of his Physician's and Surgeon's Certificate without further
26 process.

27 ///

CONTINGENCY

10. This stipulation shall be subject to approval by the Medical Board of California. Respondent understands and agrees that counsel for Complainant and the staff of the Medical Board of California may communicate directly with the Board regarding this stipulation and surrender, without notice to or participation by Respondent. By signing the stipulation, Respondent understands and agrees that he may not withdraw his agreement or seek to rescind the stipulation prior to the time the Board considers and acts upon it. If the Board fails to adopt this stipulation as its Decision and Order, the Stipulated Surrender and Disciplinary Order shall be of no force or effect, except for this paragraph, it shall be inadmissible in any legal action between the parties, and the Board shall not be disqualified from further action by having considered this matter.

11. The parties understand and agree that facsimile copies of this Stipulated Surrender of License and Order, including facsimile signatures thereto, shall have the same force and effect as the originals.

12. In consideration of the foregoing admissions and stipulations, the parties agree that the Board may, without further notice or formal proceeding, issue and enter the following Order:

ORDER

IT IS HEREBY ORDERED that Physician's and Surgeon's Certificate No. G 49972, issued to Respondent Roger Henry Steuble, M.D., is surrendered and accepted by the Medical Board of California.

1. The surrender of Respondent's Physician's and Surgeon's Certificate and the acceptance of the surrendered license by the Board shall constitute the imposition of discipline against Respondent. This stipulation constitutes a record of the discipline and shall become a part of Respondent's license history with the Medical Board of California.

2. Respondent shall lose all rights and privileges as a Physician and Surgeon in California as of the effective date of the Board's Decision and Order.

3. Respondent shall cause to be delivered to the Board his pocket license and, if one was issued, his wall certificate on or before the effective date of the Decision and Order.

4. If Respondent ever files an application for licensure or a petition for reinstatement in the State of California, the Board shall treat it as a petition for reinstatement. Respondent must comply with all the laws, regulations and procedures for reinstatement of a revoked license in effect at the time the petition is filed, and all of the charges and allegations contained in Accusation No. 02-2012-226564 shall be deemed to be true, correct and admitted by Respondent when the Board determines whether to grant or deny the petition.

5. If Respondent should ever apply or reapply for a new license or certification, or petition for reinstatement of a license, by any other health care licensing agency in the State of California, all of the charges and allegations contained in Accusation, No. 02-2012-226564 shall be deemed to be true, correct, and admitted by Respondent for the purpose of any Statement of Issues or any other proceeding seeking to deny or restrict licensure.

ACCEPTANCE

I have carefully read the Stipulated Surrender of License and Order. I understand the stipulation and the effect it will have on my Physician's and Surgeon's Certificate. I enter into this Stipulated Surrender of License and Order voluntarily, knowingly, and intelligently, and agree to be bound by the Decision and Order of the Medical Board of California.

DATED:

78/13

Roger H. Steuble MD
ROGER HENRY STEUBLE, M.D.
Respondent

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ENDORSEMENT

The foregoing Stipulated Surrender of License and Order is hereby respectfully submitted
for consideration by the Medical Board of California of the Department of Consumer Affairs.

Dated: 7/22/13

Respectfully submitted,

KAMALA D. HARRIS
Attorney General of California
E. A. JONES III
Supervising Deputy Attorney General



VLADIMIR SHALKEVICH
Deputy Attorney General
Attorneys for Complainant

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Exhibit A

Accusation No. 02-2012-226564

1 KAMALA D. HARRIS
Attorney General of California
2 E. A. JONES III
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3 VLADIMIR SHALKEVICH
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7 *Attorneys for Complainant*

FILED
STATE OF CALIFORNIA
MEDICAL BOARD OF CALIFORNIA
SACRAMENTO *June 17, 2013*
BY: *[Signature]* ANALYST

8 **BEFORE THE**
MEDICAL BOARD OF CALIFORNIA
9 **DEPARTMENT OF CONSUMER AFFAIRS**
STATE OF CALIFORNIA

10 In the Matter of the Accusation Against:

Case No. 02-2012-226564

11 **ROGER HENRY STEUBLE, M.D.**
12 **130 Arroyo Place**
13 **Jackson, California 95642**

A C C U S A T I O N

14 **Physician's and Surgeon's Certificate No. G**
15 **49972**

Respondent.

16
17 Complainant alleges:

18 **PARTIES**

19 1. Kimberly Kirchmeyer (Complainant) brings this Accusation solely in her official
20 capacity as the Interim Executive Director of the Medical Board of California, Department of
21 Consumer Affairs.

22 2. On or about May 23, 1983, the Medical Board of California issued Physician's and
23 Surgeon's Certificate Number G 49972 to Roger Henry Steuble, M.D. (Respondent). The
24 Physician's and Surgeon's Certificate expired on February 28, 2013, and has not been renewed.

25 **JURISDICTION**

26 3. This Accusation is brought before the Medical Board of California (Board),
27 Department of Consumer Affairs, under the authority of the following laws. All section
28 references are to the Business and Professions Code unless otherwise indicated.

1 4. Section 822 of the Code states:

2 "If a licensing agency determines that its licentiate's ability to practice his or her profession
3 safely is impaired because the licentiate is mentally ill, or physically ill affecting competency, the
4 licensing agency may take action by any one of the following methods:

5 (a) Revoking the licentiate's certificate or license.

6 (b) Suspending the licentiate's right to practice.

7 (c) Placing the licentiate on probation.

8 (d) Taking such other action in relation to the licentiate as the licensing agency in its
9 discretion deems proper.

10 The licensing agency shall not reinstate a revoked or suspended certificate or license until it
11 has received competent evidence of the absence or control of the condition which caused its
12 action and until it is satisfied that with due regard for the public health and safety the person's
13 right to practice his or her profession may be safely reinstated."

14 5. Section 824 of the Code states:

15 "The licensing agency may proceed against a licentiate under either Section 820, or 822,
16 or under both sections."

17 6. Section 825 of the Code states:

18 "As used in this article with reference to persons holding licenses as physicians and
19 surgeons, 'licensing agency' means a panel of the Division of Medical Quality¹."

20 7. Section 826 of the Code states:

21 "The proceedings under Sections 821 and 822 shall be conducted in accordance with
22 Chapter 5 (commencing with Section 11500) of Part 1 of Division 3 of Title 2 of the Government

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24

25 ¹ California Business and Professions Code section 2002, as amended and effective January 1,
26 2008, provides that, unless otherwise expressly provided, the term "board" as used in the State
27 Medical Practice Act (Cal. Bus. & Prof. Code section 2000, et seq) means "the Medical Board of
28 California," and reference to the Division of Medical Quality and Division of Licensing in the Act
or any other provision of law shall be deemed to refer to the board.

1 Code, and the licensing agency and the licentiate shall have all the rights and powers granted
2 therein."

3 **FIRST CAUSE FOR DISCIPLINE**

4 (Disability)

5 8. Respondent is subject to disciplinary action under Section 822 of the Code in that he
6 is disabled, and his disability impairs his ability to practice medicine safely. The circumstances
7 are as follows:

8 9. Since on or before May 28, 2013, based on review of Respondent's medical records
9 and correspondence from his treating physicians, and after an interview of Respondent, the Board
10 determined that Respondent's ability to practice medicine safely has been impaired because he is
11 suffering from an illness affecting his competency.

12 **PRAYER**

13 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,
14 and that following the hearing, the Medical Board of California issue a decision:


15 1. Revoking or suspending Physician's and Surgeon's Certificate Number G 49972,
16 issued to Roger Henry Steuble, M.D.;

17 2. Revoking, suspending or denying approval of Roger H. Steuble, M.D.'s authority to
18 supervise physician assistants, pursuant to section 3527 of the Code;

19 3. If placed on probation, ordering Roger H. Steuble, M.D. to pay the Medical Board of
20 California the costs of probation monitoring; and

21 4. Taking such other and further action as deemed necessary and proper.

22 DATED: June 17, 2013

23 
24 Kimberly Kirchmeyer
25 Interim Executive Director
26 Medical Board of California
27 Department of Consumer Affairs
28 State of California
Complainant

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